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October 22, 2021

**VIA ECF**

Magistrate Judge Sarah L. Cave  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Room 1670  
New York, NY 10007

Re: *Iowa Pub. Emps. ' Ret. Sys. et al. v. Bank of Am. Corp. et al.*, No. 17-cv-6221 (KPF)

Dear Judge Cave:

Plaintiffs respectfully request leave to file their letter-reply in support of Plaintiffs' letter-motion for reconsideration (ECF 478) of the Court's order granting in part Defendants' letter-motion requesting leave to file a sur-reply (ECF 476) with redactions to references to confidential material, pursuant to paragraph I.G of this Court's Individual Rules of Practice.

Plaintiffs request to file their letter-reply in redacted form as it contains references to expert materials and documents that have already been, or will be, filed under seal or in redacted form pursuant to sealing orders issued by Judge Failla and have been designated as Highly Confidential or Confidential pursuant to the Protective Order in this case (ECF 150). *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006) (recognizing that the Court must "balance competing considerations against [the presumption of access]," including but not limited to "the privacy interests of those resisting disclosure") (quoting *United States v. Amodeo*, 71 F.3d 1044, 1050 (2d Cir. 1995)). Defendants' likewise sought leave to file their letter-motion and letter-opposition with redactions (ECF 472, 479), and the Court granted their requests (ECF 474, 482).

Respectfully submitted,

/s/ Michael B. Eisenkraft  
Michael B. Eisenkraft  
COHEN MILSTEIN SELLERS & TOLL  
PLLC

Plaintiffs' letter-motion (ECF No. 485) requesting to redact confidential materials from their letter-reply (ECF No. 486) is GRANTED, and the Clerk of Court is respectfully directed to limit access to ECF No. 486 to Court users and the case participants. Plaintiffs shall promptly file on ECF a redacted version of ECF No. 486.

The Clerk of Court is respectfully directed to close ECF No. 485.

SO ORDERED 10/25/2021

A handwritten signature in black ink, appearing to read "Sarah L. Cave".  
SARAH L. CAVE  
United States Magistrate Judge